

## **DOCUMENT REQUESTS**

Please produce the documents set forth in Schedule A, provided, however, that in order to facilitate production of documents on an expedited basis, you may limit your production at this time to documents you furnished at any time after November 8, 2016 to: (a) the Special Counsel's Office established by Department of Justice Order No. 3915-2017 (May 17, 2017); (b) the United States Attorney's Office for the Southern District of New York ("SDNY"); (c) any other federal or state regulatory and/or law enforcement agency; (d) any congressional committee; or (e) in civil or other litigation. This includes but is not limited to documents that were voluntarily provided, produced under compulsion, or seized. Instructions for producing documents appear in Schedule B, and definitions appear in Schedule C.

### **SCHEDULE A**

1) All documents relating to the following:

- (a) Discussions or attempts to provide or receive election information, campaign data, or campaign communications with, to, or from foreign entities or individuals in connection with the 2016 U.S. Presidential primary or general elections. This includes, but is not limited to, voter data, polling information, political ad targeting, voter registration rolls, social media data, and campaign or party e-mails.
- (b) Any contacts, direct or indirect, from January 1, 2015 to January 20, 2017 between or involving the Russian Federation and its officials, agents, intermediaries, and/or instrumentalities and any of the following: Donald Trump, the Trump Campaign, the Trump Organization, Paul Manafort, Rick Gates, Michael Cohen, Michael Flynn, Jeff Sessions, Jared Kushner, Thomas Bossert, Roger Stone, Jerome Corsi, George Papadopoulos, Carter Page, Konstantin Kilimnik, K.T. McFarland, and/or Erik Prince.
- (c) Any contacts, direct or indirect, from January 1, 2016 to the present between or involving WikiLeaks and its officials, agents, intermediaries, and/or instrumentalities.
- (d) Any contacts, direct or indirect, from January 1, 2016 to the present between Paul Manafort and/or Rick Gates and any of the following individuals: Konstantin Kilimnik, Serhiy Lyovochkin, and/or Rinat Akhmetov.
- (e) Any contacts, direct or indirect, from January 1, 2016 to the present between Michael Cohen and any of the following: Viktor Vekselberg, Andrew Intrater, or Columbus Nova or its officials, agents, intermediaries, and/or instrumentalities.